

What constitutes data processing?

„Processing covers a wide range of operations performed on personal data, including by manual or automated means. It includes the collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction of personal data.

The General Data Protection Regulation (GDPR) applies to the processing of personal data wholly or partly by automated means as well as to non-automated processing, if it is part of a structured filing system.

Examples of processing

- staff management and payroll administration;
- access to/consultation of a contacts database containing personal data;
- sending promotional emails*;
- shredding documents containing personal data;
- posting/putting a photo of a person on a website;
- storing IP addresses or MAC addresses;
- video recording (CCTV).

*Please remember that to send direct marketing emails, you also have to comply with the marketing rules set out in the ePrivacy Directive.

References:

- Article 4(2) and(6) of the GDPR